

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

DEBORAH S. SKEANS, Executrix of  
the ESTATE OF FRANK E. PAVLIS,

Plaintiff,

v.

KEY COMMERCIAL FINANCE,  
LLC, KEY COMMERCIAL  
FINANCE PROPERTIES, LLC,  
EQUITY PROS, LLC, and MOBILE  
AGENCY, LLC

Defendants.

No. 1:18-cv-01516-CFC-MPT

JUSTIN BILLINGSLEY and KEY  
COMMERCIAL FINANCE, LLC,

Third-Party  
Plaintiffs,

v.

DEBORAH S. SKEANS and DARBIN  
SKEANS,

Third-Party  
Defendants.

**LOCAL RULE 7.1.1 STATEMENT**

I, Joelle E. Polesky, certify pursuant to Rule 7.1.1 of the Local Rules of Civil Practice and Procedure of the United States District Court for the District of Delaware, that I made a reasonable effort, by both telephone and email correspondence, to reach agreement with counsel for Defendants on the matters set forth in the Motion of Plaintiff Deborah S. Skeans for Leave to File Supplemental

Complaint (“Motion”), filed contemporaneously with this Local Rule 7.1.1.  
Statement.

STRADLEY RONON  
STEVENS & YOUNG, LLP

/s/ Joelle E. Polesky  
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*Attorneys for Plaintiff, Deborah  
S. Skeans, Executrix of the Estate  
of Frank E. Pavlis*

Dated: January 20, 2021